| TERRY LOCKLEAR, individually and |) | |
|---|---|----------------------------|
| on behalf of all others similarly situated, |) | |
| |) | |
| Plaintiff, |) | |
| |) | CIVIL ACTION |
| v. |) | FILE NO. 1:14-CV-00744-SCJ |
| |) | |
| DOW JONES & COMPANY, INC., a |) | |
| Delaware corporation d/b/a WALL |) | |
| STREET JOURNAL LIVE, |) | |
| |) | |
| Defendant. |) | |

CONSENT MOTION FOR EXTENSIONS OF TIME <u>AND SUPPORTING MEMORANDUM</u>

Defendant Dow Jones & Company, Inc. ("Dow Jones") moves the Court, pursuant to Federal Rule of Civil Procedure 6(b)(1), for an Order extending the time for Dow Jones to answer, move, plead, or otherwise respond to the Complaint filed in this action through and including May 12, 2014. In addition, the parties request an extension of the time under Local Rule 23.1, under which the parties must confer "to determine whether proper management of the case or the interests of putative class members require the entry of an order limiting either the parties or counsel in communications with putative class members."

The Plaintiff filed this action on March 13, 2014 and served the Defendant with process in this case on March 20, 2014. These requests for an extension are made pursuant to Fed. R. Civ. P. 6(b)(1), before the original time periods expire on April 10, 2014. The Plaintiff, through the undersigned counsel, consents to an extension of the time for the Defendant to answer, move, plead, or otherwise respond to the Complaint through and including May 12, 2014, and the parties jointly request an extension of the time period under Local Rule 23.1 through and including May 12, 2014. A proposed Order is filed herewith.

Respectfully submitted this 8th day of April, 2014.

<u>/s/ Richard H. Sinkfield</u>

Richard H. Sinkfield Georgia Bar No. 649100 Julia B. Stone Georgia Bar No. 200070

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Email: rsinkfield@rh-law.com

Attorneys for Defendant Dow Jones & Company, Inc.

Consented to by:

/s/ Jennifer Auer Jordan

Jennifer Auer Jordan Georgia Bar No. 027857 THE JORDAN FIRM, LLC 1447 Peachtree Street, N.E., Suite 880 Atlanta, Georgia 30309 Telephone: (404) 445-8400

Telephone: (404) 445-8400 Facsimile: (404) 445-8477

Email: jennifer@thejordanfirm.com

| TERRY LOCKLEAR, individually and |) | |
|---|---|----------------------------|
| on behalf of all others similarly situated, |) | |
| |) | |
| Plaintiff, |) | |
| |) | CIVIL ACTION |
| V. |) | FILE NO. 1:14-CV-00744-SCJ |
| |) | |
| DOW JONES & COMPANY, INC., a |) | |
| Delaware corporation d/b/a WALL |) | |
| STREET JOURNAL LIVE, |) | |
| |) | |
| Defendant. |) | |

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 5.1, I certify that this pleading complies with the font and point selections set forth in Local Rule 5.1. This pleading has been prepared using Times New Roman font (14 point).

/s/ Richard H. Sinkfield

Richard H. Sinkfield Georgia Bar No. 649100 Julia B. Stone Georgia Bar No. 200070

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 $Attorneys \ for \ Defendant \ Dow \ Jones \ \&$

Company, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2014, I electronically filed the within and foregoing "CONSENT MOTION FOR EXTENSIONS OF TIME AND SUPPORTING MEMORANDUM" with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Jennifer Auer Jordan jennifer@thejordanfirm.com

This 8th day of April, 2014.

/s/ Richard H. Sinkfield
Richard H. Sinkfield
Georgia Bar No. 649100

Julia B. Stone Georgia Bar No. 200070

ROGERS & HARDIN, LLP 2700 International Tower 229 Peachtree Street, NE Atlanta, Georgia 30303 Telephone: (404) 522-4700

Facsimile: (404) 525-2224 Email: rsinkfield@rh-law.com

Attorneys for Defendant Dow Jones & Company, Inc.

| TERRY LOCKLEAR, individually and on behalf of all others similarly situated, |)) | | | |
|--|---|--|--|--|
| Plaintiff, v. DOW JONES & COMPANY, INC., a Delaware corporation d/b/a WALL STREET JOURNAL LIVE, Defendant. |))) CIVIL ACTION) FILE NO. 1:14-CV-00744-SCJ)))))) | | | |
| [PROPOSED] ORDER | | | | |
| The Consent Motion for Extensions | of Time and Supporting Memorandum, | | | |
| having been duly considered and for good | cause shown, it is hereby ordered as | | | |
| follows: | | | | |
| (1) Defendant Dow Jones & Compa | ny, Inc. shall have through and including | | | |
| May 12, 2014 to answer, move, plead, or | otherwise respond to the Complaint in | | | |
| this action; and | | | | |
| (2) The parties shall have through a | nd including May 12, 2014 to confer | | | |
| under Local Rule 23.1. | | | | |
| SO ORDERED this day of _ | , 2014. | | | |

Honorable Steve C. Jones
United States District Judge